

Reynolds, Rebekah

From: Emily Schilling <ESchilling@hollandhart.com>
Sent: Wednesday, August 20, 2014 2:46 PM
To: Reynolds, Rebekah
Cc: Johnstone, Jeremy; 'ctownsend@ormat.com'
Subject: RE: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

Yes, just me.

Emily C. Schilling
(801) 799-5753

From: Reynolds, Rebekah [mailto:Reynolds.Rebekah@epa.gov]
Sent: Wednesday, August 20, 2014 3:29 PM
To: Emily Schilling
Cc: Johnstone, Jeremy; 'ctownsend@ormat.com'
Subject: RE: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

That is fine. Am I correct in assuming it will just be you on the call? Thanks.

From: Emily Schilling <ESchilling@hollandhart.com>
Sent: Wednesday, August 20, 2014 2:25 PM
To: Reynolds, Rebekah
Cc: Johnstone, Jeremy; 'ctownsend@ormat.com'
Subject: RE: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

Can we push the call to 5:30 MST/4:30 PST today? I'm tied up for the next couple of hours. If that works I can give you a call.

Thanks, Emily

From: Reynolds, Rebekah [mailto:Reynolds.Rebekah@epa.gov]
Sent: Wednesday, August 20, 2014 3:06 PM
To: Emily Schilling
Cc: Johnstone, Jeremy; 'ctownsend@ormat.com'
Subject: RE: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

Hi Emily, I am available after 2pm pst tomorrow or Friday morning, except from 11-12pm pst. However, if possible it might be best to check in today (I'm free all afternoon) because after today Jeremy will be out of

the office until after labor day and depending on the question regarding scope or the extent of the extension I may need to confer with him. Thank you, Rebekah

From: Emily Schilling <ECSchilling@hollandhart.com>
Sent: Wednesday, August 20, 2014 1:31 PM
To: Reynolds, Rebekah
Cc: Johnstone, Jeremy; 'ctownsend@ormat.com'
Subject: RE: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

Rebekah,

I just got off a cell phone call with PGV personnel, who still do not have any on-site communication capability or access to shared servers as a result of Iselle.

I'd like to discuss the scope of certain of the requests, as well as a limited extension in light of the difficulties associated with locating and uploading documents in the aftermath of a 200-year storm.

Are you available for a call tomorrow afternoon or Friday morning?

Thanks very much, Emily

Emily C. Schilling
(801) 799-5753

From: Reynolds, Rebekah [<mailto:Reynolds.Rebekah@epa.gov>]
Sent: Thursday, August 14, 2014 4:33 PM
To: Emily Schilling
Cc: Johnstone, Jeremy; 'ctownsend@ormat.com'; 'Sheila Jones'
Subject: RE: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

Emily,

Thank you for submitting Puna Geothermal Venture's (PGV's) response to EPA's findings of violation and requests for information. EPA is in the process of reviewing PGV's response. In order to complete its review, EPA requests the following documents:

Findings 1–3 & 13 –Provide copies of all Hazard Assessments and supporting documentation from 1999 until June 2010 (already provided).

Finding 4 – Provide a copy of Section f of Volume 11 of the 1991 Job Book.

Finding 7 – Provide a copy of the following documentation cited in the document bates stamped PGV7-CBI-000001:

- 1) OEC Operation and Maintenance Manual, Section 8, Troubleshooting;
- 2) COD discussion in the Operating Procedures Section behind the OPERATING PROCEDURES Tab in the "Puna Expansion" Compliance Workbook; and

- 3) COD discussion in the Process Hazard Analysis worksheets located behind the PROCESS HAZARD EVALUATION Tab in the "Puna Expansion" Compliance Workbook.

Finding 8 - Provide a copy of information pertaining to 40 CFR § 68.69(a)(3)(i-ii) in both a) PGV's Operations Manual (and/or other operating procedures) and b) PGV Safety Manual. Provide a copy of any other references in a) to b).

Finding 10-Provide documentation that records the results of the work discussed in the attached "Work Order Complete Reports", as required under 40 CFR § 68.73(d)(4).

Finding 14, bullet 1.c.7 –The referenced attachment 14.5 does not appear to be responsive to the allegation, please confirm that this was the intended attachment or provide the intended document.

Also - please provide complete PHAs conducted subsequent to 1995. For the 1995 PHA, please provide a complete copy of App E.

EPA requests that PGV submit these documents by close of business of September 5, 2014. We understand that facility personnel have been busy in the aftermath of Iselle but believe three weeks provide sufficient time to gather and submit these documents.

If you have any questions about this request, please don't hesitate to contact me.

Best Regards,

Rebekah

Rebekah Reynolds
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(415) 972-3916 (Phone)
(415) 947-3570 (Fax)

From: Emily Schilling [<mailto:ECSchilling@hollandhart.com>]
Sent: Wednesday, July 30, 2014 12:16 PM
To: Johnstone, Jeremy
Cc: Ohad Zimron; George Wells (GWells@ORMAT.COM); Cliff Townsend (ctownsend@ormat.com)
Subject: Puna Geothermal Venture's Response to EPA April 29, 2014 Findings of Violation

Dear Mr. Johnstone—

On behalf of Ormat Technologies, Inc. and Puna Geothermal Venture ("PGV"), I am attaching a cover letter and narrative responses to EPA's findings of violation and requests for information, which were issued to PGV in April of 2014. Copies of the letter and narrative response, and a disk of responsive documents, have been sent via overnight mail to your attention.

If you have any questions about the responses or the production, please feel free to contact me at (202) 654-6922 or ecschilling@hollandhart.com.

Best regards, Emily

Emily C. Schilling

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